

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	CASE NO. 12-05763 BKT
ANA LYDIA ALEJANDRO HERNANDEZ	*	CHAPTER 13
DEBTOR	*	

**DEBTOR'S REPLY TO *MOTION TO DISMISS UNDER SECTION 1307(c)(6)*
FILED BY POPULAR AUTO DOCKET NO. 61**

TO THE HONORABLE COURT:

COMES NOW, ANA LYDIA ALEJANDRO HERNANDEZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Popular Auto filed a *Motion to Dismiss Under Section 1307(c)(6)*, docket no. 61, basically alleging that the debtor has failed to maintain current the post-petition car loan direct payments with said creditor, allegedly owing Popular Auto the sum of \$1,445.82. *Motion to Dismiss Under Section 1307(c)(6)*, paragraph 6, docket no. 61.

2. The debtor respectfully submits that she is making direct post-petition payments to Popular Auto. On May 19, 2014, the debtor paid Popular Auto the sum of \$458.99, to cover the April, 2014, direct car loan payments. Attached is evidence of last three (3) payments made to Popular Auto to cover the months of February, March and April, 2014.

3. The debtor is up-to-date in her direct car loan payments to Popular Auto and in her Plan payments to the Trustee.

Page -2 –
Debtor's Reply to Popular Auto's Motion to Dismiss
Case no. 12-05763 BKT13

4. Based on the above stated, the debtor respectfully requests that this Honorable Court deny Popular Auto's motion requesting dismissal, docket no. 61.

WHEREFORE, debtor respectfully requests this Honorable Court grant the present reply and deny the *Motion to Dismiss Under Section 1307(c)(6)*, docket no. 61, filed by Popular Auto in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Edgar A Vega Rivera, Esq., Counsel for Popular Auto; I also certify that a copy of this motion was sent via US Mail to Ana Lydia Alejandro Hernandez, Borinquen Valley 236 Formon Street Caguas PR 00725, debtor in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of May, 2014.

/s/Roberto Figueroa Carrasquillo
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458.25

NUM. DE CUENTA - ACCOUNT NUMBER
822-001-0492458-0002
Banco
VENCE EN - DUE ON NUM. DE PAGO
PAYMENT NO.
MAR 27 FEB 16 - 14 46

458.25

NUM. DE CUENTA - ACCOUNT NUMBER
822-001-0492458-0002
Banco
VENCE EN - DUE ON NUM. DE PAGO
PAYMENT NO.
APR 29 2014 MAR 16 - 14 47

TC-12
Corto Regular
MAR 19 2014

NUM. DE CUENTA - ACCOUNT NUMBER
822-001-0492458-0002
VENCE EN - DUE ON NUM. DE PAGO
PAYMENT NO.
ABR 16 - 14 48